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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSE LUIS REYNALDO REYES-CASTILLO,
a/k/a "Molesto,"
DAVID ARTURO PEREZ-MANCHAME,
a/k/a "Walter Melendez,"
a/k/a "Herbi," a/k/a "Catracho,"
JOEL VARGAS-ESCOBAR,
a/k/a "Momia," and
ALEXANDER DE JESUS FIGUEROA-
TORRES,

Defendants.

Case No. 2:19-cr-00103-GMN-MDC

**Government's Emergency Motion for
a Status Conference**

The United States, by and through the undersigned, respectfully moves this Court to set a status conference as soon as practicable to address the current trial date. Trial is currently set for April 21, 2025. The trial date was set with the agreement of the Court, the government, and three of the four charged defendants, excluding defendant Joel Vargas-Escobar. On April 1, 2025, defendant Joel Vargas-Escobar was taken into federal custody and must be joined for trial with his co-defendants.

MEMORANDUM OF POINTS AND AUTHORITIES

I. Relevant Background and Procedural Posture

On March 2, 2018, defendants Jose Luis Reynaldo Reyes-Castillo (“Reyes-Castillo”) and David Arturo Perez-Manchame (“Perez-Manchame”) were arrested by the Las Vegas Metropolitan Police Department. They have remained in continuous custody since that date.¹ On April 30, 2019, a federal grand jury sitting in the District of Nevada returned an indictment charging Reyes-Castillo and Perez-Manchame with Murder in Aid of Racketeering in violation of 18 U.S.C. § 1959(a)(1) and related crimes. On August 4, 2021, a superseding indictment was filed charging Reyes-Castillo, Perez-Manchame, Joel Vargas-Escobar (“Vargas-Escobar”), and Alexander de Jesus Figueroa-Torres (“Figueroa-Torres”) with RICO Conspiracy in violation of 18 U.S.C. § 1962(d), Murder in Aid of Racketeering in violation of 18 U.S.C. § 1959(a)(1), and related crimes. On the same date the superseding indictment was filed, arrest warrants were issued for Vargas-Escobar and Figueroa-Torres but their whereabouts were unknown.² In January 2024, Figueroa-Torres voluntarily reentered the United States and was arrested in the

¹ Reyes-Castillo and Perez-Manchame were initially held on immigration related crimes. As discussed *infra*, they were later transferred to federal custody after being indicted on federal RICO charges.

² Both Vargas-Escobar and Figueroa-Torres had been deported to El Salvador prior to the superseding indictment being filed.

1 Southern District of Texas on immigration related charges. In February 2024, Figueroa-Torres
2 was transferred to the District of Nevada pursuant to the arrest warrant that was issued on
3 August 4, 2021. He has remained in continuous federal custody since his arrest.

4 On June 26, 2024, a second superseding indictment was filed containing the same
5 charges for each defendant as the first superseding indictment but added additional overt acts to
6 Count One, RICO Conspiracy. On February 25, 2025, a third superseding indictment was filed
7 containing the same charges for each defendant as the first and second superseding indictments
8 but added additional overt acts to Count One. On the same date the third superseding
9 indictment was filed, an arrest warrant was issued for Joel Vargas-Escobar. On April 1, 2025,
10 Vargas-Escobar was arrested by the Federal Bureau of Investigation (FBI) in Westbury, New
11 York. He made his initial appearance in the Eastern District of New York on April 2, 2025, and
12 was ordered to be transferred to the District of Nevada pursuant to the arrest warrant issued on
13 February 25, 2025.

14 II. Legal Standard

15 Under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, co-defendants must be joined for
16 trial. *See* 18 U.S.C. § 3161(h)(6). The legislative history of Section 3161(h)(6) “demonstrates a
17 strong Congressional preference for joint trials” and “that the Speedy Trial Act does not alter
18 the present rules governing severance of co-defendants by forcing the government to prosecute
19 defendants separately. Congress thus explicitly recognized the utility of multi-defendant trials to
20 effectuate the prompt efficient disposition of criminal justice...” *United States v. Culpepper*, 898
21 F.2d 65, 68 (6th Cir. 1990). Further, the trial of a defendant “shall not commence less than
22 thirty days from the date on which the defendant first appears through counsel...” *See*
23 18 U.S.C. § 3161(c)(2).

III. Argument

The current trial setting of April 21, 2025, was set by the Court while Vargas-Escobar was a fugitive. However, Vargas-Escobar is now in custody and has made an appearance before a federal magistrate judge. He has been ordered to be transferred to the District of Nevada and will arrive in this district prior to April 21, 2025. Pursuant to 18 U.S.C. § 3161(h)(6) he must be joined for trial with his co-defendants. Given the short time between his expected arrival in the District of Nevada and the current trial setting, it is unrealistic that he will be ready to proceed to trial on April 21. Further, unless he consents in writing trial may not commence within 30 days of his first appearance. Given the complexities and expected duration of this multi-defendant trial, and that filing deadlines are quickly approaching, the government respectfully requests the Court to set this matter for a status conference as soon as practicable to determine how to proceed.

DATED: April 2, 2025

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